

KARA B. HENDRICKS, ESQ.
Nevada Bar No. 07743
BETHANY L. RABE, ESQ.
Nevada Bar No. 11691
GREENBERG TRAURIG, LLP
10845 Griffith Peak Drive, Suite 600
Las Vegas, Nevada 89135
Telephone: (702) 792-3773
Facsimile: (702) 792-9002
Email: hendricksk@gtlaw.com
rabeb@gtlaw.com

Counsel for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

HAKKASAN Limited, a United Kingdom
limited liability company,

Plaintiff,

vs.

KILO CLUB, LLC, a Nevada limited liability
company,

Defendant.

Case No. 2:22-cv-01695-APG-EJY

**STIPULATION AND ~~PROPOSED~~ ORDER TO
STAY DISPOSITIVE MOTION DEADLINE**

[FIRST REQUEST]¹

Plaintiff HAKKASAN LIMITED (“Hakkasan”), by and through its counsel, the law firm of Greenberg Traurig, LLP, and Defendant KILO CLUB, LLC, by and through its counsel, Darkhorse Attorneys, hereby stipulate to extend the dispositive motion deadline given the other pending dispositive motions.

The parties to this case have each filed a dispositive motion. Hakkasan has filed a motion for summary judgment based upon Kilo Club’s deemed admitted requests for admissions. *See* ECF

¹ While this is the first request to stay the dispositive motion deadline, this is the third time this deadline will have been impacted, as there were previously two extensions of the discovery period.

No. 53. Kilo Club has filed a motion for judgment on the pleadings. *See* ECF No. 59. Kilo Club has also filed a motion to withdraw its deemed admissions. *See* ECF No. 56. Hakkasan has opposed this motion, but requested that if the Court permits Kilo Club to withdraw its deemed admissions, that the Court reopen discovery so that the parties can explore and develop the case on the merits. *See, e.g.*, ECF No. 60, at 9-10.

Given the major impact on the case of these pending motions, the parties stipulate and request that the Court stay the dispositive motion deadline until forty-five (45) days following disposition of the above-pending motions, or as set forth in any new scheduling order. This will conserve the parties' resources by avoiding the filing of duplicative and potentially unnecessary motions. This stipulation is made in good faith and not for purposes of delay.

IT IS SO STIPULATED.

DATED this 4th day of April, 2024.

GREENBERG TRAUIG, LLP

/s/ Kara B. Hendricks

Kara B. Hendricks, Esq.
Nevada Bar No. 07743
Bethany L. Rabe, Esq.
Nevada Bar No. 11691
10845 Griffith Peak Drive, Suite 600
Las Vegas, Nevada 89135
Counsel for Plaintiff Hakkasan Limited

DATED this 4th day of April, 2024.

DARKHORSE ATTORNEYS

/s/ Andrew P. Connors

Andrew P. Connors, Esq. (Pro Hac Vice)
Virginia Bar No. 80248
Managing Partner, Darkhorse Law PLLC
119 Tradewynd Drive, Suite B
Lynchburg, Virginia 24502

GALLIAN WELKER & ASSOCIATES
Nathan E. Lawrence, Esq.
Nevada Bar No. 15060
730 Las Vegas Blvd. S., Ste. 104
Las Vegas, Nevada 89101

Counsel for Defendant Kilo Club LLC

IT IS SO ORDERED.

Rayna J. Zouchak
UNITED STATES MAGISTRATE JUDGE

DATED: April 4, 2024